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**From:** Bohan, Suzanne [bohan.suzanne@epa.gov]  
**Sent:** 7/5/2018 3:08:50 PM  
**To:** Thomas, Deb [thomas.debrah@epa.gov]  
**Subject:** DW Emergency Order - CODY, WY - Squirrels

**Deb – The following write-up is in ECEJ's hot issues for this week. If you have any questions, please let me know.**

**SDWA Enforcement Issued an Emergency Administrative Order to the City of Cody Water System in Park County, Wyoming**

Key Message: On July 3, 2018, EPA issued a 1431 Order (EAO) in response to a potential imminent and substantial endangerment at the City of Cody Water System.

- In preparation for an upcoming sanitary survey, the operator requested a Circuit Rider from Wyoming Association of Rural Water Systems visit the system. On Monday, July 2, 2018, the operator mentioned to the Circuit Rider when the storage tank was cleaned in September 2017, there were multiple ground squirrel carcasses within it. The Circuit Rider informed the operator they needed to contact EPA.
- On July 3, 2018, the Water Superintendent for the City of Cody notified EPA the 2 million gallon finished water storage tank had approximately six ground squirrel carcasses found during a tank cleaning and inspection that was performed by divers in September 2017. All ground squirrels and sediment were removed during the cleaning.
- The only possible entry pathway identified was a duckbill valve overflow that was located at ground level. The system modified the overflow by raising it up to 12-24" above ground level in May 2017.
- After speaking with the R8 Office of Water Protection's toxicologist, EPA has determined that a potential imminent and substantial endangerment to human health may still exist at the system.
- The EAO will require the system to inspect the tank for *new* animal carcasses.
  - If additional carcasses are identified, the system will be required to issue a boil order, provide an alternative source of drinking water to all customers, increase sampling, drain and disinfect the tank, and submit a plan and schedule for professional repair of the tank to ensure rodent-related contaminants do not enter the system in the future.
- Prior to Order issuance, EPA will consult with Wyoming DEQ and Department of Health (includes the State Epidemiologist).

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